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*Co-Counsel to the Ad Hoc Committee of
Governmental and Other Contingent
Litigation Claimants*

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re	x
PURDUE PHARMA L.P., <i>et al.</i> ,	:
Debtors ¹ .	:
	:
	:

**TWENTY SIXTH MONTHLY FEE STATEMENT OF OTTERBOURG P.C. FOR
ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED AND
REIMBURSEMENT OF EXPENSES INCURRED AS CO-COUNSEL OF THE AD HOC
COMMITTEE'S PROFESSIONALS FOR THE PERIOD OF
NOVEMBER 1, 2021 THROUGH AND INCLUDING NOVEMBER 30, 2021**

Name of Applicant:	Otterbourg P.C.
Applicant's Role in Case:	Co-Counsel to the Ad Hoc Committee of Governmental and Other Contingent Litigation Claimants
Date of Order Approving Debtors' Payment of Fees and Expenses of Applicant:	December 2, 2019, [dkt. no. 553]

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF L.P. (0495), SVC Pharma L.P. (5717) and SVC Pharma Inc. (4014). The Debtors' corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

Period for Which Compensation is Sought:	November 1, 2021 – November 30, 2021
Total Amount of Fees Incurred:	\$72,099.50
Total Fees Requested (80%):	\$57,679.60
Total Reimbursement of Expenses Incurred:	\$0.00
Total Reimbursement of Expenses Requested (100%):	\$0.00
Total compensation and Reimbursement Requested in this Statement:	\$57,679.60
This is Applicant's:	Twenty Sixth Monthly Fee Statement

Pursuant to the *Order Authorizing the Debtors to Assume the Reimbursement Agreement and Pay the Fees and Expenses of the Ad Hoc Committee's Professionals*, dated December 2, 2019 [Dkt. No. 553] (the “Fee Assumption Order”), and the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals*, dated November 21, 2019 [Dkt. No. 529] (the “Interim Compensation Order”), Otterbourg P.C. (the “Applicant”), Co-Counsel to the Ad Hoc Committee of Governmental and Other Contingent Litigation Claimants in the above-captioned case, hereby submits this Twenty Sixth Monthly Fee Statement (the “Fee Statement”) for the period of November 1, 2021 through and including November 30, 2021 (the “Statement Period”).

Itemization of Services Rendered and Disbursements Incurred

1. Annexed hereto as **Exhibit A** is a chart of the aggregate number of hours expended and fees incurred by professionals and paraprofessionals during the Statement Period with respect to each of the project categories. As reflected in Exhibit A, Applicant incurred \$72,099.50 in fees during the Statement Period. Pursuant to this Fee Statement, Applicant seeks reimbursement for 80% of such fees, totaling \$57,679.60.

2. Annexed hereto as **Exhibit B** is a chart of Applicant's professionals and paraprofessionals, including the standard hourly rate for each attorney and paraprofessional who rendered services to the Debtors in connection with these chapter 11 cases during the Statement Period and the title, hourly rate, aggregate hours worked and the amount of fees earned by each professional. The blended hourly billing rate of attorneys for all services provided during the Statement Period is \$1,182.18². The Blended hourly rate of all paraprofessionals is \$345.00³. A copy of the computer-generated time entries reflecting the time recorded, organized in project billing categories by Applicant is attached hereto as **Exhibit C**.

3. Applicant, to the best of its knowledge, has not included any fees in connection with or relating to the allocation of value among the Debtors' creditors.

Notice

4. Applicant will provide notice of this Fee Statement in accordance with the Interim Compensation Order.

WHEREFORE, Applicant, in connection with services rendered as co-counsel to the ad hoc committee of governmental and other contingent litigation claimants, respectfully requests (i) compensation in the amount of \$57,679.60, which is equal to 80% of the total amount of reasonable compensation for actual, necessary legal services that Applicant incurred in connection with such services during the Statement Period (*i.e.*, \$72,099.50).

² The blended hourly billing rate of \$1,182.18 is derived by dividing the total fees for attorneys of \$70,340.00 by the total hours of 59.5.

³ The Blended hourly billing rate of \$345.00 for paraprofessionals is similarly derived by dividing the total fees for paraprofessionals of \$1,759.50 by the total hours of 5.1.

Dated: December 13, 2021
New York, New York

OTTERBOURG P.C.

By: /s/ Melanie L. Cyganowski
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*Co-Counsel to the Ad Hoc Committee of
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EXHIBIT A

Fees By Project Category

**SUMMARY OF COMPENSATION BY PROJECT CODE
FOR THE STATEMENT PERIOD**

Project Code	Project Category	Total Hours	Total Fees
PU06	Employment & Fee Applications	11.9	\$9,501.50
PU08	Litigation: Contest Matters, Adversary	5.9	\$6,324.00
PU09	Meetings and Communications w/ AHC	2.0	\$2,449.50
PU11	Plan & Disclosure Statement	44.8	\$53,824.50
	TOTALS:	64.6	\$72,099.50

EXHIBIT B

Professional and Paraprofessional Fees

**SUMMARY OF HOURS BILLED BY PROFESSIONALS AND PARAPROFESSIONALS
FOR THE STATEMENT PERIOD**

Professional	Year Admitted	Rate Per Hour	No. of Hrs.	Total Compensation
Melanie L. Cyganowski ("MLC") Partner	1982	\$1470.00	27.8	\$40,866.00
Erik B. Weinick ("EBW") Partner	2002	\$895.00	7.2	\$6,444.00
Jennifer S. Feeney ("JSF") Of Counsel	1998	\$940.00	24.5	\$23,030.00
Jessica K. Hildebrandt ("JKH") Paralegal	N/A	\$345.00	5.1	\$1,759.50
	TOTAL		64.6	\$72,099.50

EXHIBIT C

Time Detail

OTTERBOURG P.C.

230 PARK AVENUE

NEW YORK, NY 10169-0075

December 8, 2021

BILL NO. 220554

Client/Matter No.: 20186/0002
Matter Name: CHAPTER 11
Billing Partner: RL STEHL

For Services Rendered Through November 30, 2021:

Phase: PU06		EMPLOYMENT & FEE APPLICATIONS		
<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
11/08/21	JSF	Prepare Legal Papers Prepare Interim Fee Application	2.10	1,974.00
11/09/21	JSF	Prepare Legal Papers Review September time detail	.90	846.00
11/09/21	MLC	Review Documents Review of September fee monthly statement	.20	294.00
11/09/21	JKH	Prepare Papers Prepare September monthly statement	.60	207.00
11/10/21	JSF	Prepare Legal Papers Prepare Sixth Interim Fee Application	2.30	2,162.00
11/10/21	JKH	Prepare Papers Prepare fee application and exhibits	1.40	483.00
11/11/21	JSF	Prepare Legal Papers Review and Revise Interim Fee Application	1.10	1,034.00

OTTERBOURG P.C.

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<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
11/11/21	MLC	Review Documents Review of Otterbourg's 6th Interim Fee Application and Exhibits	1.00	1,470.00
11/11/21	JKH	Prepare Papers Prepare fee application	.70	241.50
11/12/21	JSF	Examine Documents Review of Interim Fee Application for Filing	.40	376.00
11/12/21	JKH	Prepare Papers Prepare final September statement for filing	.20	69.00
11/15/21	JKH	Prepare Papers Finalize fee application for filing	.20	69.00
11/30/21	JKH	Prepare Papers Prepare October monthly statement	.80	276.00
TOTAL PHASE PU06			11.90	\$9,501.50

Phase: PU08

LITIGATION: CONTESTED MATTERS, ADVERSARY

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>

OTTERBOURG P.C.

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<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
11/05/21	MLC	Review Documents Review of draft responses for production served upon AD HOC in insurance AP	.50	735.00
11/05/21	MLC	Review Documents Review of Court order denying chambers conference request	.20	294.00
11/07/21	JSF	Examine Documents Review of Draft Responses of Committees to Document Requests in Insurance Litigation	.40	376.00
11/07/21	MLC	Review Documents Review of UCC's edits to discovery responses	.30	441.00
11/09/21	MLC	Review Documents Review and analysis of SDNY Order denying motion of insurers to withdraw reference of AP	1.10	1,617.00
11/10/21	JKH	Review Documents Review and calendar oral argument schedule	.20	69.00
11/11/21	JSF	Examine Documents Review of Notices of Appearance for District Court Appeal	.20	188.00
11/11/21	MLC	Review Documents Review of draft NOAs for SDNY	.50	735.00

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<u>ATTORNEY</u>	<u>DATE</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
JKH	11/11/21	Prepare Papers Prepare and file NOAs in SDNY action	.80	276.00
JSF	11/18/21	Examine Documents Review of Summary of Court Hearing	.20	188.00
EBW	11/18/21	Attendance at Court (Conference) Telephonic attendance at omnibus hearing.	1.00	895.00
MLC	11/18/21	Review Documents Review of summary at hearing before Judge Drain	.30	441.00
JKH	11/24/21	Prepare Papers Prepare electronic device notice for SDNY district court hearing	.20	69.00
TOTAL PHASE PU08			5.90	\$6,324.00

Phase: PU09

MEETINGS & COMMUNICATIONS W/ AD HOC

<u>ATTORNEY</u>	<u>DATE</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
JSF	11/03/21	Telephone Call(s) Attend Meeting of AHC - Status Update	.30	282.00
MLC	11/03/21	Attend Creditors Meeting AD HOC meeting	.40	588.00

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<u>ATTORNEY</u>	<u>DATE</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
JSF	11/17/21	Telephone Call(s) Attend Weekly Update Call with AHC	.30	282.00
EBW	11/17/21	Telephone Call(s) Attendance at weekly update call.	.30	268.50
MLC	11/17/21	Conference call(s) Committee meeting of AD HOC	.40	588.00
MLC	11/18/21	Correspondence Correspondence from KL re: Drain decision	.30	441.00
TOTAL PHASE PU09			2.00	\$2,449.50

Phase:	PU11	PLAN & DISCLOSURE STATEMENT		
<u>ATTORNEY</u>	<u>DATE</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
JSF	11/02/21	Examine Documents Review of Updates on Stay Motions	.40	376.00
MLC	11/03/21	Review Documents Review of draft outline of argument to District Court	1.20	1,764.00

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<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
11/05/21	MLC	Correspondence Correspondence with AD HOC counsel and State Subgroup re: station/mootness stipulation waiver	1.10	1,617.00
11/09/21	JSF	Telephone Call(s) Attend Telephonic Court Hearing re: Stay Pending Appeal	7.30	6,862.00
11/09/21	MLC	Correspondence Correspondence summarizing Purdue hearing before Judge Drain	.80	1,176.00
11/10/21	JSF	Examine Documents Review of Summary of Stay Hearing to AHC	.20	188.00
11/11/21	JSF	Examine Documents Review of Draft Appellate Brief of AHC	1.20	1,128.00
11/12/21	JSF	Examine Documents Review of Revised Appellate Brief	.60	564.00
11/12/21	MLC	Correspondence Correspondence re: TopCo	.20	294.00
11/15/21	JSF	Examine Documents Review of Appellee Briefs	.60	564.00
11/15/21	MLC	Review Documents Review of final draft of Appellate Brief	1.30	1,911.00

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<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
11/17/21	EBW	Analysis of Legal Papers Analysis of appellate briefs.	3.60	3,222.00
11/17/21	MLC	Telephone Call(s) Telephone call with Marco Acerra re: TopCo	.40	588.00
11/17/21	MLC	Review Documents Review and analysis of Appellate Briefs; Review and analysis of Appellate Brief	4.50	6,615.00
11/18/21	EBW	Analysis of Legal Papers Analysis of appellate briefs	1.20	1,074.00
11/19/21	MLC	Review Documents Review of draft order re: NCSG and MSGE fees	.40	588.00
11/19/21	MLC	Correspondence Correspondence with Co-Counsel re: lift stay motion	.60	882.00
11/23/21	EBW	Analysis of Legal Papers Review of appellate briefs.	1.10	984.50
11/24/21	MLC	Correspondence Correspondence with AD HOC re: SDNY Oral Argument on Appeal	.20	294.00
11/26/21	MLC	Review Documents Review and analysis of SDNY Docket Entry with questions from J. McMahon re: Appeal	1.70	2,499.00

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<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
11/27/21	MLC	Correspondence Follow-up correspondence with AD HOC Counsel re: SDNY Appellate argument	.50	735.00
11/29/21	MLC	Telephone Call(s) Conference call with AD HOC Counsel and State Subgroup preparing for oral argument before SDNY	1.10	1,617.00
11/29/21	MLC	Review Documents Review of Supplement Brief filed by certain States responding to Judge's questions	1.50	2,205.00
11/30/21	JSF	Telephone Call(s) Attend Telephonically District Court Oral Argument re: Appeals of Confirmation Order	6.00	5,640.00
11/30/21	MLC	Attendance at Court (Conference) General appearance on behalf of AHC before SDNY Court for hearing on appeals	6.50	9,555.00
11/30/21	MLC	Conference out of Office Conference with co-counsel for AHC during break re appellate issues raised during oral argument	.60	882.00
TOTAL PHASE PU11			44.80	\$53,824.50
TOTAL FOR SERVICES				\$72,099.50